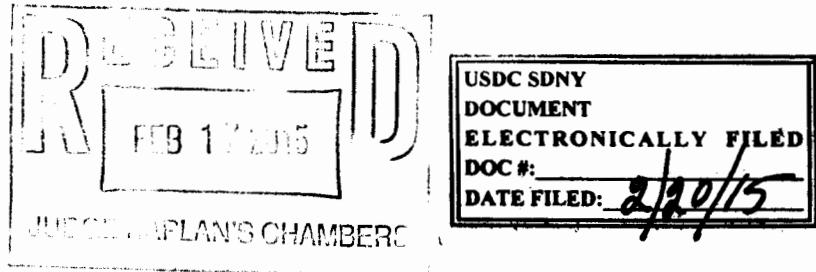


Linklaters

MEMO ENDORSED

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The Honorable Lewis A. Kaplan
 United States District Judge
 Daniel Patrick Moynihan
 United States Courthouse
 500 Pearl Street, Courtroom 21B
 New York, NY 10007-1312



By Hand and ECF

February 12, 2015

ICBC (London) plc v. The Blacksands Pacific Group, Inc., Index No. 15 Civ. 0070 (LAK) (FM)

Dear Judge Kaplan:

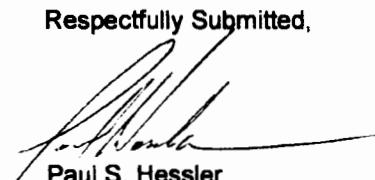
We represent Plaintiff and Counterclaim-Defendant ICBC (London) plc. We write to request the Court's permission to file a reply brief of up to 15 pages, rather than the 10 pages specified in Your Honor's Individual Rules of Practice.

We commenced this action in state court by a motion for summary judgment in lieu of complaint. On Friday, February 6, the Defendant filed its response, raising a number of purported defenses, a request to stay entry of judgment, and objections to the relief sought in our motion. Our reply will be filed tomorrow.

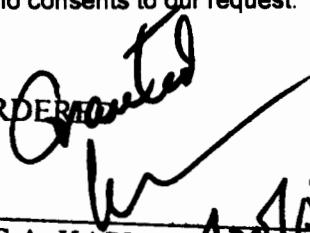
We are making every effort to keep our reply as concise as possible, but respectfully request the additional pages in order that we may fully address the points raised by the Defendant.

We have conferred with Defendant's counsel, who consents to our request.

Respectfully Submitted,


 Paul S. Hessler
 On Behalf of ICBC (London) plc

SO ORDERED


 LEWIS A. KAPLAN, USDC

cc (by email): Kevin J. Fee, Esq., Kornstein Veisz Wexler & Pollard, LLP

This communication is confidential and may be privileged or otherwise protected by work product immunity.

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A19471496/0.1/12 Feb 2015